

Plaintiffs' Exhibit 188

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES, et al.,)
)
)
Plaintiffs,)
v.) No. 1:23-cv-00108-LMB-JFA
)
)
GOOGLE LLC,)
)
)
Defendant.)

**DECLARATION OF [DECLARANT]
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
GOOGLE'S MOTION FOR SUMMARY JUDGEMENT**

[Declarant], pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. I am a Contracting Officer at the United States Air Force (“Air Force”) and submit this Declaration in support of Plaintiffs’ Opposition to Google’s Motion for Summary Judgment.
3. The Air Force is contractually obligated to reimburse at cost all payments made by GSD&M to execute approved ad purchases on behalf of the Air Force.
4. Beyond purchasing advertising, GSD&M also provides other advertising services, which are compensated separately from advertising purchases.
5. In coordination with GSD&M, the Air Force develops and approves detailed media plans, which authorize GSD&M to execute advertising purchases on the Air Force’s behalf, in accordance with those media plans.

6. The discretion afforded to GSD&M is limited to that authorized and approved by an Air Force media plan, and GSD&M works closely with the Air Force to effectuate the Air Force's goals and decisions.

7. The exhibit beginning with Bates number USAF-ADS-0000771834 is a true and accurate conformed copy of the Air Force's advertising contract with GSD&M showing that media services are compensated differently than media buys.

8. The exhibit beginning with Bates number USAF-ADS-000001422 is a true and correct copy of a 2022 media plan showing digital media strategy and recommendations relative to a certain ad campaign, a Comment Resolution Matrix showing the Air Force's feedback to the plan, and a cover email showing noting that the ad agency incorporated the feedback and requesting Air Force's approval of the updated plan.

9. Contact information for Air Force staff included in the documents cited in this Declaration is not widely published or available to the general public as a matter of course, and making it available on the public docket threatens to disrupt orderly and efficient agency operations.

10. The exhibits discussed above were made and kept in the ordinary course of the Air Force's business, and making and keeping these documents was a regular practice of the Air Force.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 16 May 2024.

Signed: 
ROBERTA L. HATCH

Cleveland County, OK